



Heidelberg Web Systems, Inc.
Environmental, Health & Safety Department
121 Broadway
Dover, New Hampshire 03820
Tel: (603) 743 - 5563
Fax: (603) 743 - 5942

November 9, 2000

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

To Performance Track Information Center,

Please find enclosed an amended version of the National Achievement Track application form for Heidelberg Web Systems, Inc., located at 121 Broadway, Dover, New Hampshire 03820. This application was amended as a result of conversations with Ms. Jean Holbrook, US EPA, Region 1. Aspects 2, 3, and 4 were revised to include baseline environmental data.

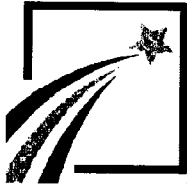
If you have any comments or questions please contact me,

Sincerely,

A handwritten signature in black ink, appearing to read "K. Jones", followed by a long horizontal line.

Kenneth M. Jones
Heidelberg Web Systems, Inc.

Enclosure: NEAT Application



***National
Environmental
Achievement Track***
As Revised 11/9/00 by K.M. Jones
Application Form

Heidelberg Web Systems, Inc.

Name of facility

Name of parent company (if any)

121 Broadway

Street address

Street address (continued)

Dover, New Hampshire 03820

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Kenneth M. Jones

Title Corporate EHS Manager

Phone 603-743-5563

Fax 603-740-5942

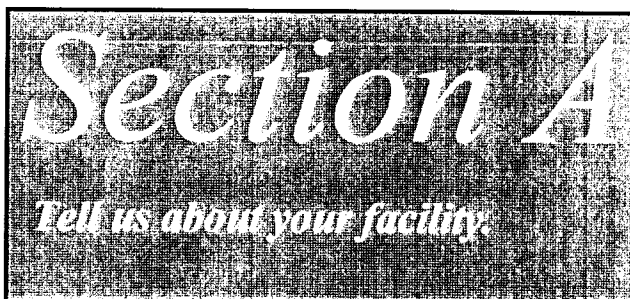
E-mail ken.jones@us.heidelberg.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

Web Offset Printing Presses and Related Equipment

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3555

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☒ 500-1,000

☐ More than 1,000



5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

NHD037695236

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

Checklist Attached

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

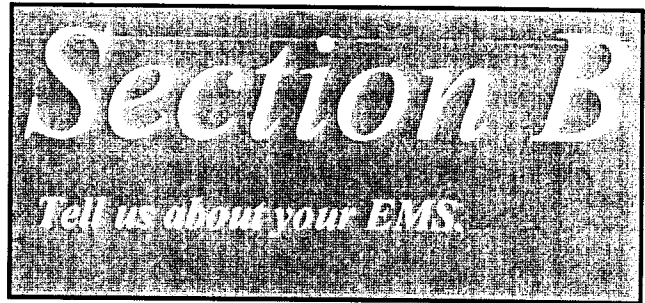
8 Optional: Is there anything else you would like to tell us about your facility?

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- | | |
|--|---|
| <i>a.</i> Environmental policy | <input checked="" type="checkbox"/> Yes |
| <i>b.</i> Planning | <input checked="" type="checkbox"/> Yes |
| <i>c.</i> Implementation and operation | <input checked="" type="checkbox"/> Yes |
| <i>d.</i> Checking and corrective action | <input checked="" type="checkbox"/> Yes |
| <i>e.</i> Management review | <input checked="" type="checkbox"/> Yes |

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

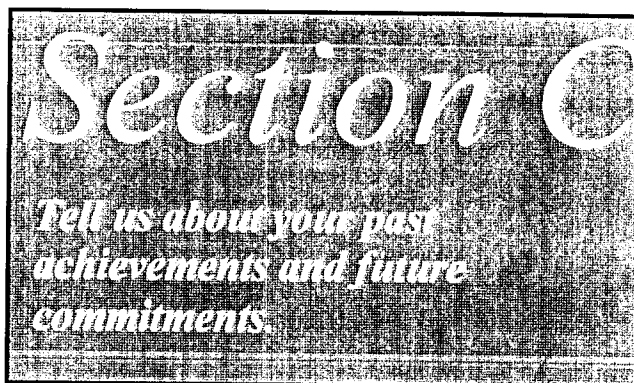
☐ Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Waste-Paint Waste	75	Metric Tons	41	Metric Tons
<p>i. How is the current level an improvement over the previous level?</p> <p>The amount of excess/waste paint generated by our painting operation was reduced by +/- 40 %</p> <p>ii. How did you achieve this improvement?</p> <p>The improvement of this aspect was through the introduction of single component water-based paint formulations, and the used of low-volume paint guns.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
Energy-Electricity	Quantity 9.0	Units GWh/a	Quantity 7.5	Units GWh/a
<p>i. How is the current level an improvement over the previous level?</p> <p>Electricity use was improved by +/-20% over the past two years.</p>				
<p>ii. How did you achieve this improvement?</p> <p>This improvement was achieved through the renovation of our Dover facility. The renovation included a relamping project, and replace of old electrical fixtures.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? VOC emissions from painting operations
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:
Absolute value 10,780.3/lbs.
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 6,000/lbs.
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

The facility is conducting a feasibility study to determine if modern powder coating technology can be used in our painting operation. If powder coating proves to be a financially reasonable alternative to our present paint process, then a process change may be implemented. This process change will contribute to VOC reduction.

Second aspect you've selected

a. What is the aspect?

Material Use - recycling of glass and plastic containers

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 250 containers
(Quantity/Units)
- ☐ Option B:
In terms of
units of production 0%
or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☐ Option A:
Absolute value (Quantity/Units)
- ☒ Option B:
In terms of
units of production 85%
or output (Quantity/Units)

e. How will you achieve this improvement?

The facility cafeteria serves approximately 400 meals daily resulting in the generation of approximately 250 waste glass and plastic containers. We will begin to segregate glass and plastic containers from general solid waste in our cafeteria areas. The glass and plastic containers will be recycled.

*Revised
11/09/00
[Signature]*

Third aspect you've selected

a. What is the aspect?

Air Emissions-trip reduction

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value
CO = 21.6 Lbs/day
NOx = 1.35 Lbs/day
CO2 = 360 Lbs/day
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output
0%
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value
(Quantity/Units)

☒ Option B:
In terms of
units of production
or output
20%
(Quantity/Units)

e. How will you achieve this improvement?

The facility will evaluate opportunities to reduce the number of vehicle trips between our Dover and Durham facilities (9 miles apart). Employees make approximately 25 round trips between the two facilities daily for business purposes. Baseline CO, NOx, and CO2 emission levels were estimated using the typical emissions factors for an "average" passenger car found on the EPA website at www.epa.gov/otaq/ann-emit.htm.

The baseline level of 450 vehicle miles per day is an estimate only to be refined as part of the initial phase of the performance improvement project. Actual baseline levels will be reported along with the first year's improvement data, in our first annual environmental performance report for our operation. Baselines and improvements will be measured in terms of estimated annual or daily pollutant emissions levels. The facility will implement a shuttle service to reduce the vehicle trips between these facilities.

*Reviewed
11/29/09
[Signature]*

Fourth aspect you've selected

a. What is the aspect?

Materials Use - recycling white office paper

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value
135 cubic feet
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output
0%
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

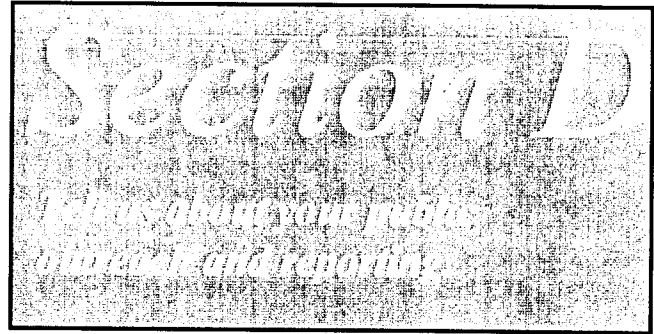
- ☐ Option A:
Absolute value (Quantity/Units)
- ☒ Option B:
In terms of units of production or output 50% (Quantity/Units)

e. How will you achieve this improvement?

Approximately, 135 cubic feet of waste white office paper is generated, not currently recycled daily. The facility will begin to segregate white office paper from general office waste and recycle this material.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Meetings with local representatives and regulatory authorities. Mailing of our annual environmental report to interested parties.

2 How do you inform community members of important matters that affect them?

Annual Environmental Report, and meetings with local officials.

3 How will you make the Achievement Track Annual Performance Report available to the public?

- ☒ Website www.heidelberg.com
- ☐ Newspaper
- ☒ Open Houses
- ☐ Other

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/Citizen Group</i>	Dover Fire Department	Ron Clymer	603-742-4646
<i>State/Local Regulator</i>	New Hampshire Department of Environmental Services	Steve Croce	603-271-3000
<i>Other community/local reference</i>	City of Dover, Wastewater Treatment Plant	Arnie Powers	603-742-2453

Section E

Application and Participation Statement

On behalf of Heidelberg Web Systems, Inc. 121 Broadway
[my facility],


I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date



Printed Name/Title Robert A. Brown, President

- Signature on Original Application

Facility Name Heidelberg Web Systems, Inc.

Facility Street Address 121 Broadway, Dover, New Hampshire 03820

Facility ID Numbers NHD037695236

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140